

Appendix C

Training Requirements

C-1. Purpose. This Appendix specifies, consolidates, and outlines the minimum training requirements for personnel performing duties that involve the management of Hazardous Materials (HMs), Hazardous Wastes (HWs), Universal Waste (UWs), Solid Wastes (SWs), and Recyclable Materials (RMs), Asbestos Containing Materials (ACMs) and Lead Based Paint Training are discussed in B1-3-4 and B2-2-1 respectively.

C-2. General.

a. Federal, State, and Army Regulations require that personnel who perform functions involving HMs, HWs, UWs, and ACM must be trained.

b. Commanders, Directors, and other in-line managers can be held civilly or criminally accountable for not properly training or supervising their personnel under the “responsible corporate officers doctrine.”

C-3. Key applicable regulations.

a. 29 CFR 1910.120

b. 29 CFR 1910.1200

c. 49 CFR 172.704

d. 40 CFR 262

e. DOD 4500.9R Defense Transportation Regulation

C-4. Personnel. Key personnel positions listed below are identified by job titles and general duty descriptions:

a. Job Title: Chief, Prevention Branch

Duty Description: DPW-ENRD Branch Chief responsible for all aspects of environmental management related to the prevention of pollution which includes but is not limited to hazardous materials, solid waste and hazardous waste, asbestos and lead paint, PCBs, spill prevention, affirmative procurement, and environmental management systems.

b. Job Title: HWM Policy Manager:

Duty Description: DPW-ENRD action officer responsible for Resource Conservation & Recovery Act (RCRA) Hazardous Waste Management (HWM) and Universal Waste Management (UWM) compliance. Responsible for ensuring that Fort Eustis and Fort Story comply with all applicable Federal, State, and local laws and Department of Army regulations and policies pertaining to the identification, storage, transportation, and disposal of hazardous wastes. Review, update, and coordinate local HWM and UWM regulations, plans, and materials. Develop, update, and conduct HWM and UWM training. Provide technical and compliance guidance concerning HWM and UWM requirements to Commanders, Directors, and subordinate personnel to include unit/activities inspections and technical assistance visits.

c. Job Title: Hazardous Waste Accumulation Facility (HWAFF) Operations Officer:

Duty Description: DPW-ENRD action officer responsible for HWAFF operations, including Contract Officer's Representative (COR) for HWAFF and Used Oil contracts. Responsible for ensuring HWAFF compliance with all applicable Federal, State, and local laws and Department of Army regulations and policies pertaining to the

identification, storage, transportation, and disposal of HWs, UWs, and NHWs.

d. Job Title: Activity Environmental Coordinator (AEC):

Duty Description: The AEC is the single point of contact for all activity environmental matters. Ensures environmental compliance with all Federal, State, and local rules and regulations. Ensures compliance with all DOD, DA, and Fort Eustis and Fort Story regulations and policies. Provides management oversight and assistance to activity Hazardous Waste Coordinators (HWC), and Recycling Coordinators (RCs). Commander's or Director's representative for conducting internal Environmental Management inspections. May act on behalf of an activity's HWC. Signs Container Contents Log (CCL) certification. Is by definition, the Recycling Coordinator.

e. Job Title: Hazardous Waste Coordinator (HWC):

Duty Description: HWC manages Hazardous Waste (HW) accumulation sites: Temporary Storage Sites (TSSs) or Satellite Accumulation Sites (SASs). Ensures compliance with all Federal, State, and local rules and regulations. Ensures compliance with all DOD, DA, and Fort Eustis and Fort Story regulations and policies. Assumes accountability for proper identification, classification, packaging, labeling, marking, storage, record keeping, transportation, and reporting requirements. Trains activity's Hazardous Waste Supervisors (HWSs), Hazardous Waste Handlers (HWHs), Universal Waste Handlers (UWHs), Recycling Coordinators (RCs) and Hazardous Materials Handlers (HMHs). Provides management oversight and assistance to activity HWSs and/or HWHs. Is the Recycling Coordinator at this level.

f. Job Title: Hazardous Waste Supervisor (HWS):

Duty Description: First line supervisor of HWHs. May assist and act on behalf of the HWC when the HWC is absent for short periods of time. These duties may include but are not limited to in the proper identification, classification, packaging, labeling, marking, storage, record-keeping, transportation on-post and reporting requirements, moving, transferring, inspecting, of HW.

g. Job Title: Hazardous Waste Handlers (HWH):

Duty Description: All those individuals having assigned duties that involve handling HWs. These duties may include but are not limited to HW generation, and assisting the AEC, HWC, or HWS in the proper identification, classification, packaging, labeling, marking, storage, record-keeping, transportation on-post and reporting requirements, moving, transferring, inspecting.

h. Job Title: Universal Waste Handler (UWH):

Duty Description: All those individuals having duties that involve handling or managing UWs. These duties may include but are not limited to UW generation and in the proper identification, packaging, labeling, marking, storage, record-keeping, transportation on-post and reporting requirements, moving, transferring and inspecting. These duties will be performed by AECs, HWCs, or HWSs for activities not having these positions.

i. Job Title: Recycling Coordinator (RC):

Duty Description: The RC is the Activity's point of contact for recycling. The RC will establish and/or maintain the activity's recycling program. The RC will ensure that recyclable materials are not being discarded into the dumpsters designated for trash or other improper disposal.

j. Job Title: Hazardous Materials Handler (HMH):

Duty Description: All individuals having duties that involve handling or managing HMs.

C-5. Types of training.**a. Occupational Health and Safety Administration (OSHA):****(1) OSHA Training Required:**

(a) "HazCom" training IAW 29 CFR 1910.1200. This training is required for AECs, HWCs, HWSs, HWHs, UWHs, RCs and HMHs.

(b) HazWOPER: "First Responder - Awareness Level" training IAW 29 CFR 1910.120. This training requires annual up dates. This training is required for AECs, HWCs, HWSs, HWHs, UWHs and HMHs.

(c) Personnel requiring Basic (BEM), Intermediate (IEM), and Advanced (AEM) Environmental Management training must receive "HazCom" and "First Responder - Awareness Level" training prior to receiving EM training.

(2) HazWOPER: 24 or 40 hours Site Operations Training IAW 29 CFR 1910.120 may be substituted for First Responder training. This training may substitute for HazCom training if it meets 29 CFR 1910.1200 requirements.

(3) The Post Safety Office is the proponent for OSHA training. The Post Safety Office provides HazCom.

(4) Initial and annual refresher First Responder Awareness Level training requirements can be met by using the "Emergency First Responder, USA Awareness and Operations Level", 710869 program available from the TASC Film Booking Office. Post Safety Office's First Responder videotape may be used for annual refresher training.

b. Basic Environmental Management (BEM) training. This training is required for AECs, HWCs, HWSs, HWHs, RCs and UWHs. BEM requires annual refresher training and the Program of Instruction (POI) for Initial and Annual Refresher in paragraph 7 will be used.

c. Intermediate Environmental Management (IEM) training. This training is required for AECs, HWCs, and HWSs. IEM requires annual refresher training and the POI for Initial and Annual Refresher in paragraph 8 will be used.

d. Advanced Environmental Management (AEM) Training: This training is required for AECs and HWCs.

(1) AEM training includes initial and annual refresher training. Personnel must receive refresher training by the last day of the month in which they were trained, e.g., received training on 10 March of the previous year - must receive refresher training by 31 March of the current year).

(2) AEM training will be conducted by DPW-ENRD on a semi-annual basis. Training will be held usually during the months of March and September. An approved contractor may be used when personnel cannot attend a scheduled class conducted by DPW-ENRD and the attendees must pay for this class. The number of training sessions is based on projected requirements. Activities should plan accordingly. Priority will be given to AECs and HWCs. HWSs and HWHs will not be admitted. The POI for AEM training for AECs and HWCs is listed in paragraphs 9 and 10.

(3) AECs or HWCs will provide Basic Environmental Management (BEM) training to HWSs, HWHs, HMHs, UWH, and RCs; and provide Intermediate Environmental Management (IEM) training to HWSs.

(4) All HWSs and HWHs must be trained within 6 months of being assigned HW duties. HWSs and HWHs must work under the direct supervision of an AEC, HWC, or a trained HWS until properly trained.

e. Department of Transportation (DOT) "HazMat Employee" training IAW 49 CFR 172.704: This training must be obtained at activity expense from non-installation sources. (If the FE/FS HWAF is used, this additional training is

not necessary.)

(1) AECs and HWCs for Activities which do not secure containers or do not ship HWs, UWs, and NHWs through the HWAF facility must receive at least an 8 hour “HazMat Employee” training IAW 49 CFR 172.704. (If the FE/FS HWAF is used, this additional training is not necessary.)

(2) Personnel authorized to sign HW manifests must complete the Hazardous Waste Management and Manifesting course with respective refresher course every 24 months IAW DOD Instruction 4500.9-R Chapter 204 paragraphs D.1.d. (<http://www/hnd.usace.army.mil>).

(3) Personnel shipping Hazardous Materials must complete the Defense Packaging of Hazardous Materials for Transportation course with respective refresher course every 24 months IAW DOD Instruction 4500.9-R Chapter 204 paragraphs D.1.b. (<http://smpt.apg.army.mil>).

(4) Personnel shipping Regulated Medical Waste must complete the Transport of Biomedical Material course with respective refresher course every 24 months IAW DOD Instruction 4500.9-R Chapter 204 paragraphs D.1.e. (<http://chppm-www.apgea.army.mil/trng/datepage.htm#Force>).

f. General Environmental Management Awareness Training. ENRD provides Environmental Awareness Training to activities upon request or as needed. Topics may vary depending on the needs of a given activity and may include solid waste management, recycling, spill prevention, environmental laws and regulations, environmental safety, hazardous materials management, pollution prevention, asbestos awareness, lead awareness, understanding material safety data sheets, NEPA compliance and combinations thereof. Such training could be available for Officer Professional Development, NCO Professional Development, Sergeants Time or through other unit training programs. The Environmental Management Handbook (EM HB) provides a general overview the Fort Eustis and Fort Story environmental program and is required reading for all Officers, NCOs and appropriate civilian managers and supervisors.

g. Pollution Prevention (P2) training will be conducted or sponsored by DPW-ENRD on an as needed basis.

h. Hazardous Materials Spill Prevention Training. AECs, HWCs, and activities that store, maintain and operate petroleum/fuel facilities must have hazardous material spill prevention training. Training is conducted via two mechanisms.

(1) Hazardous Material Spill Prevention Training is conducted annually by ENRD for Activity Environmental Coordinators and Hazardous Waste Coordinators during AEM training (initial and refresher training).

(2) Hazardous Material Spill Prevention Training is conducted by ENRD for activities maintaining or utilizing bulk petroleum storage facilities (including activities operating military watercraft and fuel transport vehicles) at least annually. This includes the 7th Transportation Group, ECS 93, DPW and DPTMSEC (Felker Army Airfield fuel farm). Additional tenant activities/operations may be added when mission changes, reorganizations, or infrastructure changes occur (or assignment of new organizations to Fort Eustis or Fort Story) that may add new bulk petroleum storage facilities or potentially increase the risk of discharges.

(3) ENRD provides Hazardous Material Spill Prevention Training to other activities upon request.

i. Compliance with the National Environmental Policy Act (NEPA) and AR 200-2 Training. Activities need to be familiar with the federal requirements to assess the environmental impacts associated with actions and projects. ENRD provides training to activities based on Appendix E as needed.

C-6. Scheduling and administration of the advanced environmental management (AEM) training:

a. Personnel being appointed as AECs or HWCs requiring AEM training:

(1) Must submit a correctly completed and signed TCFE Form 643, “AEC and HWC Appointment and

Training Record” (Figure C-1) to DPW-ENRD by the required suspense date listed on the training announcement or personnel will not be allowed to attend. AEM training announcements will be disseminated by Email approximately 30 days prior to class date. The TCFE Form 643 is used to reserve classroom space and certify the training. All prerequisites must be completed and recorded on the form at time of submission and certified by the Commander or Director.

(2) AECs are required to have an Email address and must complete Block 14.b on TCFE Form 643.

(3) Must complete "HazCom" training prior to attending the AEM course. Date trained entered in Block 15 on TCFE Form 643.

(4) Must complete "First Responder - Awareness Level" training prior attending the AEM course. Date trained entered in Block 16 on TCFE Form 643. Requires annual refresher updates.

(5) Must complete the "Basic Environmental Management (BEM)" training prior to attending the AEM course. Must score at least 70% on the BEM Test. Date trained and test score entered in Block 17 on TCFE Form 643. Requires annual refresher updates.

(6) Must complete "Intermediate Environmental Management (IEM)" training prior to attending the AEM course. Must score at least 70% on the IEM Test. Date trained and test score entered in Block 18 on TCFE Form 643. Requires annual refresher updates.

(7) Commanders or directors that do not currently have either an AEC or HWC will certify personnel being appointed as AECs or HWCs have thoroughly reviewed the Environmental Management Handbook (EM HB); BEM and IEM standardized training slides; and attained a score of at least 70% on the BEM and IEM tests and record this information in Blocks 17 and 18 on TCFE Form 643.

(8) Activities are responsible for grading the BEM and IEM tests and attaching the original answer sheet to the submitted TCFE Form 643. No copies of test questions will be accepted. Activities are responsible for providing each scheduled AEC and HWC a copy of this regulation prior to the scheduled class. No copies will be provided on the day of training.

(9) AECs and HWCs must be appointed and trained before they can assume any HWM duties. AECs and HWCs must make a minimum score of 70% on the AEM test. AECs and HWCs that let their training lapse must be immediately removed from HWM duties.

b. Interim training of AECs or HWCs may be accomplished by an Activity's AEC.

(1) This AEM training is only good until the next scheduled AEM training by DPW-ENRD, e.g. March or September.

(2) AECs and HWCs must meet and complete all requirements in paragraph 5.a above.

(3) Once these requirements are met, the AEC providing the training will obtain an AEM test from DPW-ENRD and administer the test to the interim AEC or HWC.

(4) The completed TCFE 643 and answer sheet will be turned in to DPW-ENRD for grading and approval. A score of 70% must be achieved.

c. All BEM, IEM, and AEM training records must be kept for at least 3 years.

(1) The job titles and duty descriptions in paragraph 3 above will be used and modified as required.

(2) TCFE Form 642 "EM Training Record" (Figure C-2) will be used as the roster to record and document job

titles as they apply to EM, classroom attendance and training. A separate TCFE Form 642 will be completed for each type of training.

(3) The completed answer sheets TCFE Form 6270 (Figure C-3) will also be maintained with the TCFE Form 642 "EM Training Record.

(4) These records will be made available for inspections by regulators such as VDEQ and EPA copies will be retained x years.

C-7. POI for the Basic Environmental Management (BEM) - Initial and Refresher Courses: This course covers approximately 3 hours of the basics of environmental compliance, OSHA, RCRA, DOT with an emphasis on Pollution Prevention; hazardous materials and chemical safety; spills and emergency response; solid and hazardous waste management; universal waste management; and final test.

a. The standard set of training slides will be used. Activity or site specific slides may be added. These slides are currently available from DPW-ENRD on disk or by Email in MS Windows Power Point format.

b. Initial training will include the showing of the following, available from TASC: "HazMart Procedures & Operational Video (A0511-98-0001).

c. Each student will be provided a copy of the EM HB to be used as a classroom handout and as a take home reference guide. Students must receive a 70% or better on the BEM Test.

d. Students must receive a 70% or better on the BEM Test, which is included with the BEM training program.

C-8. POI for the Intermediate Environmental Management (IEM) - Initial and Refresher Courses: This course covers approximately 2 hours giving the attendee sufficient training to supervise HW operations at this level and to act as an interim AEC or HWC. The basics of regulations and legal aspects of environmental compliance; AEC and HWC duties; HWM, i.e. training requirements, waste identification, accumulation; transportation, emergency response procedures; pollution prevention and waste minimization; solid waste management and recycling are covered and final exam is given.

a. The standard set of training slides will be used. Activity or site specific slides may be added. These slides are currently available from DPW-ENRD on disk or by Email in MS Windows Power Point format.

b. Each student will be provided a copy of the EM HB to be used as a classroom handout and as a take home reference guide. Students must receive a 70% or better on the IEM Test.

c. Students must receive a 70% or better on the IEM Test, which is included with the IEM training program.

C-9. POI for the initial Advanced Environmental Management (AEM) training course: Initial training is a one day course covering regulations and legal aspects of environmental compliance; AEC and HWC duties and responsibilities; HWM, i.e. training requirements, waste identification, accumulation; transportation, emergency response procedures; pollution prevention and waste minimization; EPCRA; solid waste management and recycling; and final exam.

C-10. POI for the annual refresher Advanced Environmental Management (AEM) training course: Annual Refresher training is a one half day review course covering regulations and legal aspects of environmental compliance; Update on new and pending changes; AEC and HWC duties and responsibilities; HWM, i.e. training requirements, waste identification, accumulation, transportation, and emergency response procedures; pollution prevention and waste minimization; EPCRA; solid waste management and recycling; and final exam.

Appendix C Figure C-1 Page 1

AEC and HWC APPOINTMENT and TRAINING RECORD

Instructions for completing this form are on the reverse side.			
1. Requested Training Date: _____			
Type of Appointment - Check One		Type of Training - Check One	
<input type="checkbox"/> 2. Activity Environmental Coordinator (AEC)	<input type="checkbox"/> 4. Initial Training		
<input type="checkbox"/> 3. Hazardous Waste Coordinator (HWC)	<input type="checkbox"/> 5. Annual Refresher Training		
<input type="checkbox"/> 6. Primary Coordinator	<input type="checkbox"/> 7. Alternate Coordinator		
8. Appointee's Name: _____			
LAST NAME	FIRST NAME	MI	
9. Phone Number _____ 10. Rank or Grade* _____ 11. Job Title _____			
*Rank or Grade requirements: AEC - WO1, GS11, or higher; HWC - E-5, GS5, or higher			
12a. Group, Bde, etc.: _____ 12b. Battalion _____ 12c. Company _____			
13a. Directorate: _____ 13b. Division _____			
14a. Office Bldg No: _____ 14b. **Business Email: _____			
(** Required for AECs)			
Environmental Management Training Prerequisites			
15. Hazard Communication IAW 29 CFR 1910.1200		Date Trained: _____	
16. First Responder-Awareness Level IAW 29 CFR 1910.120		Date Trained: _____	
17. Basic Environmental Management Training:		Score: _____ Date Trained: _____	
18. Intermediate Environmental Management Training:		Score: _____ Date Trained: _____	
I certify that the prerequisites listed above have been accomplished and that all other information on this form is complete and accurate. I designate that the place of duty for the above named individual is in the classroom specified for training. I understand that I am subject to potential civil or criminal enforcement for false certification under RCRA, UCMJ, and Virginia law.			
19. Phone Number _____		20. Signature of Commander or Director _____	
21. Date _____		22. Typed or Printed Name and Grade _____	
		23. Typed or Printed Title (Commander or Director) _____	
24. Email of Commander or Director: _____			
Coordinators must receive training annually. This appointment is valid for one year from the date of successfully completing the training requirements.			
DO NOT WRITE IN THIS BLOCK - FOR ENRD USE ONLY			
DATE OF TRAINING _____		TEST SCORE(>70%) _____	
Signature of ENRD Personnel _____		<input type="checkbox"/> APPROVED <input type="checkbox"/> DISAPPROVED	

TCFE Form 643

Mar 03 (Previous Edition is Obsolete)

Appendix C Figure C-1 Page 2

INSTRUCTIONS

**ALL ENTRIES MUST BE TYPED OR CLEARLY PRINTED.
FORMS MISSING INFORMATION WILL NOT BE ACCEPTED
FORMS MUST BE SUBMITTED TO DPW-ENRD, PRIOR TO THE SUSPENSE LISTED ON THE TRAINING
ANNOUNCEMENT (MEMO OR EMAIL)**

**SCHEDULING OF ADVANCED ENVIRONMENTAL MANAGEMENT TRAINING MUST BE MADE THROUGH
THE AEC**

ITEM 1: Enter the appropriate training date for either Initial or Annual Refresher. Classes are usually scheduled during the months of March and September.

ITEM 2: Check this block if being appointed as an Activity Environmental Coordinator (AEC).

ITEM 3: Check this block if being appointed as a Hazardous Waste Coordinator (HWC).

ITEM 4: Check this block for Initial Advanced Environmental Management Training (AEM).

ITEM 5: Check this block for Annual Refresher AEM Training.

ITEM 6: Check this block if being appointed as the activity's Primary Coordinator.

ITEM 7: Check this block if being appointed as an Alternate Coordinator.

ITEM 8: Enter name of Appointee.

ITEM 9: Enter telephone number of Appointee.

ITEM 10: Enter rank or grade of Appointee - Grade Restrictions Apply.

ITEM 11: Enter the actual job title of Appointee.

ITEMS 12a, 12b, and 12c: Enter the Appointee's military organization or;

ITEMS 13a and 13b: Enter the Appointee's civilian organization.

ITEM 14a: Enter the Appointee's Office Building Number.

ITEM 14b: Enter the Appointee's Business Email Address (**This is mandatory for AECs**).

These Training Prerequisites MUST Be Completed Prior to Submitting Form for Reserving a Class Date.

ITEM 15: Enter the date the Appointee received Hazardous Communication training.

ITEM 16: Enter the date the Appointee received First Responder-Awareness Level. **This training must be updated annually.**

ITEM 17: Enter the test score and date the Appointee completed Basic Environmental Management (BEM) training. **This training must be updated annually.**

ITEM 18: Enter the test score and date the Appointee completed Intermediate Environmental Management (IEM) training. **This training must be updated annually.**

ITEM 19: Enter telephone number of Commander or Director.

ITEM 20: Signature of Commander or Director.

ITEM 21: Enter Date appointed.

ITEM 22: Typed or Printed name and rank or grade of Commander or Director.

ITEM 23: Title of Commander or Director.

ITEM 24: Email address Commander or Director.

**ONCE THE COORDINATOR SUCCESSFULLY COMPLETES THE AEM TRAINING, A COPY OF THIS FORM
WILL BE RETURNED TO THE ACTIVITY THROUGH THE AEC.**

Appendix C Figure C-2

ENVIRONMENTAL MANAGEMENT TRAINING RECORD

INSTRUCTOR'S USE: Check Appropriate Course Box		HazCom	HazWOPER First Responder Awareness Level	Intermediate Environmental Management (IEM)	P2, SW, Recycling		
Student's Name (Print Last Name, First Name, MI)	Rank or Grade	Unit or Activity (Gp/Bde & Bn & Co) or (Dir & Div)	Telephone	*I *R	**Student's EM Job Title	IEM Test Score	IEM Test Score
1							
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25							
*Initial Training (I) or Annual Refresher Training (R)		** Student's EM Job Title: HWS, HWH, UWH, HMH, ARC					
INSTRUCTOR'S NAME/SIGNATURE: _____				DATE of TRAINING: _____			

THIS PAGE NOT USED